

# **EXHIBIT N**

---

**From:** Gallo, Joseph  
**Sent:** Thursday, April 14, 2022 3:25 PM  
**To:** Stagg, Nancy; LaVigne, Christopher  
**Cc:** Breslin, Mike; Dowdy, Joe  
**Subject:** RE: Jason Williams v AT&T Mobility -- Meet and Confer  
**Attachments:** 10728780\_1\_2022.04.14 - Stipulation Extending Time re Parties' SJ Briefing.DOCX

Nancy:

We obviously disagree with your characterization of the parties' meet and confer efforts. As your email suggests, your position makes a further meet and confer call unnecessary. If you want to oppose our motion to compel as untimely, you are of course free to do so.

We appreciate your agreement to the concept of a stipulated briefing schedule regarding AT&T's motion for summary judgment. Please see attached for a proposed stipulation for your review, which also includes AT&T's related motions in limine. As you will see, we are proposing that Mr. Williams' opposition deadline be set for Monday, May 2 (i.e. 33 days after AT&T filed its motions). We are asking for three extra days beyond what you proposed in your email because of scheduling conflicts leading up to and on Friday, April 29. We have proposed a Friday, June 3 deadline for AT&T's reply. Please let us know if the stipulation is agreeable, and we will get it on file, ideally later today. Thank you.

Joe

**Joseph Gallo**  
Senior Associate  
Litigation  
t +1 212 848 9856  
[withersworldwide.com](https://withersworldwide.com) | [my profile](#)

**Secretary:** Lana Moon t +1 212 848 9821

Withers Bergman LLP  
430 Park Avenue, 10th Floor, New York, New York 10022-3505

[Law.com International's Law Firm of the Year 2021](#)



---

**From:** Stagg, Nancy <NStagg@kilpatricktownsend.com>  
**Sent:** Wednesday, April 13, 2022 2:32 PM  
**To:** Gallo, Joseph <Joseph.Gallo@withersworldwide.com>; LaVigne, Christopher <Christopher.LaVigne@withersworldwide.com>  
**Cc:** Breslin, Mike <mbreslin@kilpatricktownsend.com>; Dowdy, Joe <JDowdy@kilpatricktownsend.com>  
**Subject:** RE: Jason Williams v AT&T Mobility -- Meet and Confer

Joe,

We can talk at 5 p.m. Pacific today by telephone if you like, but let me be clear about AT&T's position so there's no confusion: both in my prior communications to you (see my email dated 2/17/2022 and the earlier one from Monday) as well as your prior communications to me (Your email dated 2/18/2022, accepting my agreement that the parties had until 3/30/2022 to file discovery motions and Chris's voice mail to me on 3/30/2022 confirming that the 30<sup>th</sup> was 'technically the last day' the parties had to file discovery motions, among others), the last date the parties agreed to extend any date for filing discovery motions was 3/30/2022. There never was any agreement otherwise. We are not "still meeting and conferring" on any live discovery issue, and certainly not after the deadline for filing motions has expired. Plaintiff did not move the Court to extend the deadline for filing motions beyond 3/30/2022 and AT&T filed its motion for summary judgment in reliance on that deadline.

With respect to an extension of time to oppose the motion for summary judgment, we are, of course, amenable to stipulating to a briefing schedule that gives Plaintiff some additional time to file the opposition as a courtesy (up to a total of 30 days), but not because of or dependent on any outstanding discovery issue. As stated above, no such outstanding discovery issues exist because the discovery period is over, but in addition none of the issues raised in the summary judgment motion (or the motions in limine) have anything to do with AT&T's discovery responses or documents.

Let me know if you want to discuss the extension of time on the MSJ opposition, or send me a stipulation to review. Thank you.

Regards,  
Nancy

**Nancy L. Stagg**

**Kilpatrick Townsend & Stockton LLP**

Suite 250 | 12255 El Camino Real | San Diego, CA 92130

office 858 350 6156 | fax 858 408 3931

[nstagg@kilpatricktownsend.com](mailto:nstagg@kilpatricktownsend.com) | [My Profile](#) | [VCard](#)

---

**From:** Gallo, Joseph <[Joseph.Gallo@withersworldwide.com](mailto:Joseph.Gallo@withersworldwide.com)>

**Sent:** Tuesday, April 12, 2022 7:48 AM

**To:** Stagg, Nancy <[NStagg@kilpatricktownsend.com](mailto:NStagg@kilpatricktownsend.com)>; LaVigne, Christopher <[Christopher.LaVigne@withersworldwide.com](mailto:Christopher.LaVigne@withersworldwide.com)>

**Cc:** Breslin, Mike <[mbreslin@kilpatricktownsend.com](mailto:mbreslin@kilpatricktownsend.com)>; Dowdy, Joe <[JDowdy@kilpatricktownsend.com](mailto:JDowdy@kilpatricktownsend.com)>

**Subject:** RE: Jason Williams v AT&T Mobility -- Meet and Confer

Nancy:

Because the parties are still meeting and conferring on these issues in good faith and there has been no trial date set, we believe any motion practice regarding these issues will not be untimely, and we expect that the court will agree. In any event, we do not need to litigate that over email. Per your email, we are available on Wednesday (tomorrow) for a meet

and confer call between 10:30am-noon Eastern time, or after 5pm Eastern time. Please let us know when you would like to schedule the call.

Separately, we intend to seek an extension of our time to respond to AT&T's summary judgment motion (in part because of the outstanding discovery issues in the case, and in part because of holidays and other scheduling conflicts). If AT&T is amenable, we propose that the parties stipulate to a briefing schedule for the summary judgment motion, which would also give AT&T additional time for its reply. We can discuss the proposed stipulation on Wednesday's call. Thank you.

Regards,  
Joe

**Joseph Gallo**  
Senior Associate  
Litigation  
t +1 212 848 9856  
[withersworldwide.com](https://www.withersworldwide.com) | [my profile](#)

**Secretary:** Lana Moon t +1 212 848 9821

Withers Bergman LLP  
430 Park Avenue, 10th Floor, New York, New York 10022-3505

[Law.com International's Law Firm of the Year 2021](#)



---

**From:** Stagg, Nancy <[NStagg@kilpatricktownsend.com](mailto:NStagg@kilpatricktownsend.com)>  
**Sent:** Monday, April 11, 2022 1:46 PM  
**To:** Gallo, Joseph <[Joseph.Gallo@withersworldwide.com](mailto:Joseph.Gallo@withersworldwide.com)>; LaVigne, Christopher <[Christopher.LaVigne@withersworldwide.com](mailto:Christopher.LaVigne@withersworldwide.com)>  
**Cc:** Breslin, Mike <[mbreslin@kilpatricktownsend.com](mailto:mbreslin@kilpatricktownsend.com)>; Dowdy, Joe <[JDowdy@kilpatricktownsend.com](mailto:JDowdy@kilpatricktownsend.com)>  
**Subject:** RE: Jason Williams v AT&T Mobility -- Meet and Confer

Joe,  
I am out of town until Wednesday. Always happy to schedule a call, and can do so on Wednesday, but based on the case motion deadline previously set by the court and our prior communications, the deadline to have brought a discovery motion was 3/30/2022. So I don't think there is any "live" discovery issue to meet and confer on at this point.

I understand from Chris you were sick, and I hope you are feeling better.

Regards,  
Nancy

**Nancy L. Stagg**  
**Kilpatrick Townsend & Stockton LLP**  
Suite 250 | 12255 El Camino Real | San Diego, CA 92130

---

**From:** Gallo, Joseph <[Joseph.Gallo@withersworldwide.com](mailto:Joseph.Gallo@withersworldwide.com)>  
**Sent:** Friday, April 8, 2022 7:36 AM  
**To:** Stagg, Nancy <[NStagg@kilpatricktownsend.com](mailto:NStagg@kilpatricktownsend.com)>; LaVigne, Christopher <[Christopher.LaVigne@withersworldwide.com](mailto:Christopher.LaVigne@withersworldwide.com)>  
**Cc:** Breslin, Mike <[mbreslin@kilpatricktownsend.com](mailto:mbreslin@kilpatricktownsend.com)>; Dowdy, Joe <[JDowdy@kilpatricktownsend.com](mailto:JDowdy@kilpatricktownsend.com)>  
**Subject:** RE: Jason Williams v AT&T Mobility -- Meet and Confer

Nancy:

I believe you and Chris have been unable to connect thus far regarding this meet and confer. Do you have any availability for a call on Monday (April 11)? Please let us know, thanks.

Joe

**Joseph Gallo**  
Senior Associate  
Litigation  
t +1 212 848 9856  
[withersworldwide.com](http://withersworldwide.com) | [my profile](#)

**Secretary:** Lana Moon t +1 212 848 9821

Withers Bergman LLP  
430 Park Avenue, 10th Floor, New York, New York 10022-3505

[Law.com International's Law Firm of the Year 2021](#)



---

**From:** Gallo, Joseph  
**Sent:** Tuesday, March 29, 2022 4:30 PM  
**To:** 'Stagg, Nancy' <[NStagg@kilpatricktownsend.com](mailto:NStagg@kilpatricktownsend.com)>; LaVigne, Christopher <[christopher.lavigne@withersworldwide.com](mailto:christopher.lavigne@withersworldwide.com)>  
**Cc:** Breslin, Mike <[mbreslin@kilpatricktownsend.com](mailto:mbreslin@kilpatricktownsend.com)>; Dowdy, Joe <[JDowdy@kilpatricktownsend.com](mailto:JDowdy@kilpatricktownsend.com)>  
**Subject:** RE: Jason Williams v AT&T Mobility -- Meet and Confer

Thanks Nancy, let's speak tomorrow. I'll either call you on your cell or send around a conference link.

Joe

**Joseph Gallo**

Senior Associate  
Litigation

t +1 212 848 9856

[withersworldwide.com](http://withersworldwide.com) | [my profile](#)

**Secretary:** Lana Moon t +1 212 848 9821

Withers Bergman LLP

430 Park Avenue, 10th Floor, New York, New York 10022-3505

[Law.com International's Law Firm of the Year 2021](#)



---

**From:** Stagg, Nancy <[NStagg@kilpatricktownsend.com](mailto:NStagg@kilpatricktownsend.com)>

**Sent:** Tuesday, March 29, 2022 4:23 PM

**To:** Gallo, Joseph <[Joseph.Gallo@withersworldwide.com](mailto:Joseph.Gallo@withersworldwide.com)>; LaVigne, Christopher <[Christopher.LaVigne@withersworldwide.com](mailto:Christopher.LaVigne@withersworldwide.com)>

**Cc:** Breslin, Mike <[mbreslin@kilpatricktownsend.com](mailto:mbreslin@kilpatricktownsend.com)>; Dowdy, Joe <[JDowdy@kilpatricktownsend.com](mailto:JDowdy@kilpatricktownsend.com)>

**Subject:** RE: Jason Williams v AT&T Mobility -- Meet and Confer

Joe,

I doubt we can reach a compromise on a privilege issue, but happy to have a discussion. I don't have too much time, but could do a call today at 5 p.m. Eastern or tomorrow morning around 10 a.m. Eastern.

You can call my cell 619 200 6364 if that's more convenient than a webex.

Thank you,

Nancy

619 200 6364

**Nancy L. Stagg**

**Kilpatrick Townsend & Stockton LLP**

Suite 250 | 12255 El Camino Real | San Diego, CA 92130

office 858 350 6156 | fax 858 408 3931

[nstagg@kilpatricktownsend.com](mailto:nstagg@kilpatricktownsend.com) | [My Profile](#) | [VCard](#)

---

**From:** Gallo, Joseph <[Joseph.Gallo@withersworldwide.com](mailto:Joseph.Gallo@withersworldwide.com)>

**Sent:** Tuesday, March 29, 2022 6:04 AM

**To:** Stagg, Nancy <[NStagg@kilpatricktownsend.com](mailto:NStagg@kilpatricktownsend.com)>; LaVigne, Christopher <[Christopher.LaVigne@withersworldwide.com](mailto:Christopher.LaVigne@withersworldwide.com)>

**Cc:** Breslin, Mike <[mbreslin@kilpatricktownsend.com](mailto:mbreslin@kilpatricktownsend.com)>; Dowdy, Joe <[JDowdy@kilpatricktownsend.com](mailto:JDowdy@kilpatricktownsend.com)>

**Subject:** RE: Jason Williams v AT&T Mobility -- Meet and Confer

Nancy:

We are in receipt of your March 25 letter. We disagree with your positions in the letter regarding the privilege issues. Per your letter, and in light of the current discovery motion deadline at the end of March, we propose a meet and confer call today to see if we can reach a compromise regarding any of these issues. Please let us know your availability for a call, thank you.

Regards,  
Joe

**Joseph Gallo**

Senior Associate

Litigation

t +1 212 848 9856

[withersworldwide.com](http://withersworldwide.com) | [my profile](#)

**Secretary:** Lana Moon t +1 212 848 9821

Withers Bergman LLP

430 Park Avenue, 10th Floor, New York, New York 10022-3505

[Law.com International's Law Firm of the Year 2021](#)



---

**From:** Stagg, Nancy <[NStagg@kilpatricktownsend.com](mailto:NStagg@kilpatricktownsend.com)>

**Sent:** Friday, March 25, 2022 5:31 PM

**To:** Gallo, Joseph <[Joseph.Gallo@withersworldwide.com](mailto:Joseph.Gallo@withersworldwide.com)>; LaVigne, Christopher

<[Christopher.LaVigne@withersworldwide.com](mailto:Christopher.LaVigne@withersworldwide.com)>

**Cc:** Breslin, Mike <[mbreslin@kilpatricktownsend.com](mailto:mbreslin@kilpatricktownsend.com)>; Dowdy, Joe <[JDowdy@kilpatricktownsend.com](mailto:JDowdy@kilpatricktownsend.com)>

**Subject:** RE: Jason Williams v AT&T Mobility -- Meet and Confer

Chris and Joe,

Please see the attached correspondence.

Regards,  
Nancy

**Nancy L. Stagg**

**Kilpatrick Townsend & Stockton LLP**

Suite 250 | 12255 El Camino Real | San Diego, CA 92130

office 858 350 6156 | fax 858 408 3931

[nstagg@kilpatricktownsend.com](mailto:nstagg@kilpatricktownsend.com) | [My Profile](#) | [VCard](#)

---

**From:** Gallo, Joseph <[Joseph.Gallo@withersworldwide.com](mailto:Joseph.Gallo@withersworldwide.com)>  
**Sent:** Thursday, March 17, 2022 9:35 AM  
**To:** Stagg, Nancy <[NStagg@kilpatricktownsend.com](mailto:NStagg@kilpatricktownsend.com)>  
**Cc:** LaVigne, Christopher <[Christopher.LaVigne@withersworldwide.com](mailto:Christopher.LaVigne@withersworldwide.com)>; Breslin, Mike <[mbreslin@kilpatricktownsend.com](mailto:mbreslin@kilpatricktownsend.com)>; Dowdy, Joe <[JDowdy@kilpatricktownsend.com](mailto:JDowdy@kilpatricktownsend.com)>; Floyd, Brooke <[bfloyd@kilpatricktownsend.com](mailto:bfloyd@kilpatricktownsend.com)>  
**Subject:** Jason Williams v AT&T Mobility -- Meet and Confer

Nancy:

Please see the attached meet and confer letter.

Regards,  
Joe

**Joseph Gallo**  
Senior Associate  
Litigation  
t +1 212 848 9856  
[withersworldwide.com](http://withersworldwide.com) | [my profile](#)

**Secretary:** Lana Moon t +1 212 848 9821

Withers Bergman LLP  
430 Park Avenue, 10th Floor, New York, New York 10022-3505

[Law.com International's Law Firm of the Year 2021](#)



---

**Withers Bergman LLP** - 430 Park Avenue, 10th Floor, New York, NY 10022-3505 T: +1 212 848 9800 F: +1 212 848 9888

Withersworldwide  
London | Cambridge | Geneva | Milan | Padua  
Hong Kong | Singapore | Tokyo | British Virgin Islands  
New York | Boston | Greenwich | New Haven | Texas  
San Francisco | Los Angeles | Rancho Santa Fe | San Diego

This email (and any attachments) is confidential and may also be legally privileged. If you are not the intended recipient please immediately notify the sender then delete it from your system. You should not copy it or use it for any purpose nor disclose its contents to any other person.



Confidentiality Notice:

This communication constitutes an electronic communication within the meaning of the Electronic Communications Privacy Act, 18 U.S.C. Section 2510, and its disclosure is strictly limited to the recipient intended by the sender of this message. This transmission, and any attachments, may contain confidential attorney-client privileged information and attorney work product. If you are not the intended recipient, any disclosure, copying, distribution or use of any of the information contained in or attached to this transmission is STRICTLY PROHIBITED. Please contact us immediately by return e-mail or at 404 815 6500, and destroy the original transmission and its attachments without reading or saving in any manner.

---

\*\*\*DISCLAIMER\*\*\* Per Treasury Department Circular 230: Any U.S. federal tax advice contained in this communication (including any attachments) is not intended or written to be used, and cannot be used, for the purpose of (i) avoiding penalties under the Internal Revenue Code or (ii) promoting, marketing or recommending to another party any transaction or matter addressed herein.